

**BEFORE THE UNITED STATES  
JUDICIAL PANEL ON MULTI-DISTRICT LITIGATION**

In re:	)	
	)	MDL Docket No. <u>Pending No. 108</u>
	)	
SAMSUNG DATA BREACH	)	
LITIGATION	)	
	)	

**NOTICE OF ERRATA**

**PLEASE TAKE NOTICE THAT** Movants Naeem Seirafi and Shelby Holtzclaw (“Movants”) respectfully submit the following Notice of Errata:

On October 7, 2022, Movants electronically filed the following documents: (1) Plaintiffs’ Motion for Transfer of Actions to the Northern District of California Pursuant to 28 U.S.C. § 1407 for Coordinated or Consolidated Pretrial Proceedings (Dkt. 1); (2) Memorandum in Support of Plaintiffs’ Motion (Dkt. 1-1); and (3) Schedule of Actions, including docket sheets and complaints for all related actions (Dkt. 1-2-1-12). Attorney Glenn A. Danas was erroneously left off the signature pages. Movants are now filing this Notice of Errata to add Mr. Danas as the attorney of record and include the corrected signature pages for Plaintiffs’ Motion for Transfer of Actions to the Northern District of California Pursuant to 28 U.S.C. § 1407 for Coordinated or Consolidated Pretrial Proceedings and the Memorandum in Support of Plaintiffs’ Motion for Transfer of Actions to the Northern District of California Pursuant to 28 U.S.C. § 1407 for Coordinated or Consolidated Pretrial Proceedings, and to amend the Proof of Service indicating that all counsel and parties were served by email on October 7, 2022 and not served through the Multidistrict Litigation’s CM/ECF system. The corrected signature pages for Plaintiffs’ Motion for Transfer of Actions to the Northern District of California Pursuant to 28 U.S.C. § 1407 for Coordinated or Consolidated Pretrial Proceedings are attached hereto as **Exhibit 1**. The corrected signature pages for the Memorandum in Support of Plaintiffs’ Motion for Transfer of Actions to the Northern District of California Pursuant to 28 U.S.C. § 1407 for Coordinated or Consolidated Pretrial

Proceedings are attached hereto as **Exhibit 2**. The Amended Proof of Service is attached hereto as **Exhibit 3**.

Dated: October 12, 2022

Respectfully submitted,

/s/ Glenn A. Danas

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*Counsel for Movants Naeem Seirafi and  
Shelby Holtzclaw*

# Exhibit 1

*Corrected signature pages from Plaintiffs' Motion for Transfer  
of Actions to the Northern District of California Pursuant to 28  
U.S.C. § 1407 for Coordinated or Consolidated Pretrial  
Proceedings*

NOTICE OF ERRATA

**BEFORE THE UNITED STATES  
JUDICIAL PANEL ON MULTI-DISTRICT LITIGATION**

In re:	)	
	)	MDL Docket No. _____
SAMSUNG DATA BREACH	)	
LITIGATION	)	
	)	

**MOTION OF PLAINTIFFS FOR TRANSFER OF ACTIONS TO THE NORTHERN  
DISTRICT OF CALIFORNIA PURSUANT TO 28 U.S.C. § 1407 FOR COORDINATED  
OR CONSOLIDATED PRETRIAL PROCEEDINGS**

Pursuant to 28 U.S.C. §1407 and Judicial Panel on Multi-District Litigation Rule 6.2, Movants Naeem Seirafi and Shelby Holtzclaw respectfully move the Panel for an Order transferring all of the currently-filed cases listed in the attached Schedule of Actions, as well as any cases subsequently filed involving similar facts or claims (“tag-along cases”) to the United States District Court of the Northern District of California or, in the alternative, to the United States District Court of New Jersey to facilitate their expeditious litigation.

This motion is based on the Memorandum of Points and Authorities and Schedule of Actions filed herewith.

Dated: October 12, 2022

Respectfully submitted,

/s/ Glenn A. Danas

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*Counsel for Movants Naeem Seirafi and  
Shelby Holtzclaw*

# Exhibit 2

*Corrected signature pages from the Memorandum in Support of  
Plaintiffs' Motion for Transfer of Actions to the Northern  
District of California Pursuant to 28 U.S.C. § 1407 for  
Coordinated or Consolidated Pretrial Proceedings*

NOTICE OF ERRATA

Furthermore, the Northern District of California is appropriate transferee district because it presents a geographically convenient and accessible venue for this nationwide litigation. At least two cases (including the first filed action currently pending) have been filed in this district. One of the *related* cases is also pending in the Los Angeles Superior Court and will likely be removed to the Central District of California. The Northern District of California is easily accessible venue for nationwide litigation and will provide all parties with the geographically convenient forum all litigants and pending actions. San Francisco offers a large number of airports and places to stay. San Francisco International Airport is less than 15 miles from the proposed transferee courthouse. Furthermore, the Northern District of California holds its hearings remote via Zoom, allowing public access.

Alternatively, the *Seirafi* Plaintiffs propose assigning cases to Honorable William J. Martini in the District Court of New Jersey, where Defendant is headquartered and five of the related actions are pending. *See, e.g., In re Marriott Int'l, Inc., Customer Data Sec. Breach Litig.*, 363 F. Supp. 3d at 1374–75 (“We select the District of Maryland as the transferee district for this litigation. Marriott is headquartered in that district, and relevant documents and witnesses thus likely will be found there.”). Judge Martini is a Senior Judge, and also has the necessary experience to administer this MDL matter.

## **I. CONCLUSION**

For the reasons set forth herein, Plaintiffs’ motion for transfer of actions pursuant to 28 U.S.C. § 1407 should be granted and these related actions, as well as any subsequently filed actions containing similar allegations, should be transferred to the U.S. District Court for the Northern District of California or, in the alternative, to the United States District Court of New Jersey.

Dated: October 12, 2022

Respectfully submitted,

/s/ Glenn S. Danas  
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*Counsel for Movants Naeem Seirafi and  
Shelby Holtzclaw*



# Exhibit 3

*Amended Proof of Service*

NOTICE OF ERRATA

**BEFORE THE UNITED STATES  
JUDICIAL PANEL ON MULTI-DISTRICT LITIGATION**

In re:

SAMSUNG DATA BREACH  
LITIGATION

)  
)  
)  
)  
)

MDL Docket No. \_\_\_\_\_

**AMENDED PROOF OF SERVICE**

In compliance with Rule 4.1(a) of the Rules of Procedure for the United States Judicial Panel on Multidistrict Litigation, I hereby certify that on October 7, 2022, I electronically filed the following: (1) Plaintiffs' Motion for Transfer of Actions to the Northern District of California Pursuant to 28 U.S.C. § 1407 for Coordinated or Consolidated Pretrial Proceedings; (2) Memorandum in Support of Plaintiffs' Motion; and (3) Schedule of Actions, including docket sheets and complaints for all related actions with the Clerk of the Court using the Judicial Panel on Multidistrict Litigation's CM/ECF system. I further certify that a copy of the foregoing was served on all counsel or parties in the manners indicated and addressed as follows:

Via U.S. Mail		
Clerk of the Court U.S. District Court for the Northern District of California 450 Golden Gate Avenue San Francisco, CA 94102	Clerk of the Court U.S. District Court for the Southern District of New York 40 Foley Square New York, NY 10007	
Clerk of the Court U.S. District Court of New Jersey 4th & Cooper Streets Camden, NJ 08101	Clerk of the Court U.S. District Court of New Jersey 50 Walnut Street Newark, NJ 07102	
Clerk of the Court U.S. District Court of New Jersey 402 East State Street Trenton, NJ 08608	Clerk of the Court U.S. District Court for the Northern District of Illinois 219 South Dearborn Street Chicago, IL 60604	

Via Electronic Mail	
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<p>Joseph J. Depalma  LITE DEPALMA GREENBERG &amp;  AFANADOR, LLC  570 Broad Street  Suite 1201  Newark, NJ 07102  jdepalma@litedepalma.com</p> <p>2:22-cv-05767  Counsel for Joseph Rollins  U.S.D.C. New Jersey</p>	<p>Christopher A. Seeger  SEEGER WEISS LLP  55 Challenger Road  6th Floor  Ridgefield Park, NJ 07660  cseeger@seegerweiss.com</p> <p>2:22-cv-5723  Counsel for Andrew Becker  U.S.D.C. New Jersey</p>
<p>James E. Cecchi  CARELLA BYRNE CECCHI OLSTEIN  BRODY &amp; AGNELLO, P.C.  5 Becker Farm Road  Roseland, NJ 07068  jcecchi@carellabyrne.com</p> <p>2:22-cv-5724</p>	<p>William S. Donio  COOPER LEVENSON, P.A.  1125 Atlantic Avenue, Third Floor  Atlantic City, NJ 08401-4891  wdonio@cooperlevenson.com</p> <p>2:22-cv-5722</p>

<p>Counsel for Anthony Dipaola, Keanna Cole, Peggy Rodriguez, Indea Sanchez, and Angelina Alvarado Scott U.S.D.C. New Jersey</p>	<p>Counsel for Angela Robinson U.S.D.C. New Jersey</p>
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Dated: October 12, 2022

/s/ Glenn A. Danas

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Ryan J. Clarkson, Esq.  
Katherine A. Bruce, Esq.  
Bahar Sodaify, Esq.  
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*Counsel for Movants Naeem Seirafi and  
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JUDICIAL PANEL ON MULTI-DISTRICT LITIGATION**

In re:

SAMSUNG DATA BREACH  
LITIGATION

MDL Docket No. \_\_\_\_\_

**PROOF OF SERVICE**

In compliance with Rule 4.1(a) of the Rules of Procedure for the United States Judicial Panel on Multidistrict Litigation, I hereby certify that on October 12, 2022, I electronically filed the following: (1) Notice of Errata; (2) Exhibit 1 Plaintiffs' Motion for Transfer of Actions to the Northern District of California Pursuant to 28 U.S.C. § 1407 for Coordinated or Consolidated Pretrial Proceedings with corrected signature pages; (3) Exhibit 2 Memorandum in Support of Plaintiffs' Motion with corrected signature pages; (4) Exhibit 3 Amended Proof of Service; and (5) Proof of Service with the Clerk of the Court using the Judicial Panel on Multidistrict Litigation's CM/ECF system. I further certify that a copy of the foregoing was served on all counsel or parties in the manners indicated and addressed as follows:

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Clerk of the Court U.S. District Court of New Jersey 402 East State Street Trenton, NJ 08608	Clerk of the Court U.S. District Court for the Northern District of Illinois 219 South Dearborn Street Chicago, IL 60604	

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James E. Cecchi CARELLA BYRNE CECCHI OLSTEIN BRODY & AGNELLO, P.C. 5 Becker Farm Road Roseland, NJ 07068 jcecchi@carellabyrne.com  2:22-cv-5724	William S. Donio COOPER LEVENSON, P.A. 1125 Atlantic Avenue, Third Floor Atlantic City, NJ 08401-4891 wdonio@cooperlevenson.com

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Dated: October 12, 2022

/s/ Glenn A. Danas  
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CLERK